

Region 2 State and Tribal Input to EPA Strategic Plan

Goal 1

How information was gathered:

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Regarding implementation of the strategic plan, NY states that while the states do the majority of work in implementing the goals of the plan, EPA funding to states continues to be cut or unavailable, for example water and wastewater infrastructure, the Resource Conservation Challenge (RCC) initiative, pollution prevention. Fiscal realities undermine the credibility of the commitments made within the strategic plan. Unilateral rescission of grant funding to states, absent a dialogue, is not an approach consistent with the partnership commitments made in the plan.

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Comments Specific to Goal 1:

The mercury strategy and targets under Goal 1 re: Clean Air are not likely to be consistent with New York expectations as NY is on record opposing the current EPA proposal for a mercury emissions cap and trade program.

The impacts of global environmental issues seem to be accelerating in the Virgin Islands. The global warming trend and the impacts of: African dust from the Sahara are of most concern. African dust contributes to health (respiratory) and coral reef decline in the Virgin Islands. Agricultural toxins are also traveling to the Territory with the dust. Other impacts from global warming include dieoffs of coral tissue from elevated sea temperature. Summer 2005 has seen massive coral bleaching events throughout the entire Virgin Islands. This may lead to massive mortality in the near future. There is also a more active hurricane season that is believed to be caused by global warming trends. The Virgin Islands has had many severe hurricanes over the years. Increasing activity and threats are very worrisome, as is the concern about sea level rise. Though none is observed at present, this would have severe impacts in the Virgin Islands as it is a coastal community.

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Comments Specific to Goal 2:

NYSDEC comments that the recommendations of the Pew Commission Oceans study was an extensive multi-year effort that illustrates the crisis state of these resources and probably warrants its own Goal area. Absent this, the content of those recommendations should be reflected in an update to Goal 2 targets and strategies.

NYSDEC states that the continued quest for TMDLs under Goal 2 re: Clean Water probably needs to be revisited as shrinking resources may need to be concentrated on actual waste minimization rather than what are becoming very costly and lengthy efforts to model and determine appropriate TMDLs for each constituent in each water body.

VIDPNR recommends that Goal 2 support capacity building at the local level for monitoring the effects of long-term water quality changing conditions on marine communities. Of particular interest are coral reef, mangroves and sea grass beds. There is a need to develop regulations for ballast water discharges from large ships, fueling activities and hull cleaning and maintenance activities. Additionally, there is a need to develop field/in vivo analytic methods for measuring contaminant levels in surface waters.

The impacts of global environmental issues seem to be accelerating in the Virgin Islands. The global warming trend and the impacts of: African dust from the Sahara are of most concern. African dust contributes to health (respiratory) and coral reef decline in the Virgin Islands. Agricultural toxins are also traveling to the Territory with the dust. Other impacts from global warming include dieoffs of coral tissue from elevated sea temperature. Summer 2005 has seen massive coral bleaching events throughout the entire Virgin Islands. This may lead to massive mortality in the near future. There is also a more active hurricane season that is believed to be caused by global warming trends. The Virgin Islands has had many severe hurricanes over the years. Increasing activity and threats are very worrisome, as is the concern about sea level rise. Though none is observed at present, this would have severe impacts in the Virgin Islands as it is a coastal community.

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Comments Specific to Goal 3:

HETF suggests that there should be a bigger focus on restoration (Goal 3). NYSDEC suggests that Land Preservation makes no recognition of the value of land acquisitions by the states for preservation, a top Governor's priority in NYS and an investment which receives no match or support from EPA.

PRQEB suggests that EPA should develop: Risk Based Corrective Action (RBCA) levels, Maximum Contaminant Levels (MCL's), Contract Required Detection Limits (CRDL's), Contract Required Quantitation Limits (CRQL's). PREQB also suggests that the strategic plan provide a new approach to contamination investigations, starting at the source.

Region 2 State and Tribal Input to EPA Strategic Plan

Goal 4

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Comments Specific to Goal 4:

Pesticides research cited under Goal 4 should improve our understanding of impacts from aquatic herbicides on non-target species, a priority need in NYS.

Chronic Wasting Disease and other emerging pathogens in our wildlife, fish and shellfish populations (applicable to Goal 4 re: Healthy Ecosystems) also need to be considered.

NYSDEC comments that the recommendations of the Pew Commission Oceans study was an extensive multi-year effort that illustrates the crisis state of these resources and probably warrants its own Goal area. Absent this, the content of those recommendations should be reflected in an update to Goal 2 and Goal 4 (Healthy Ecosystems) targets and strategies.

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Goal 5

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Comments Specific to Goal 5:

Regarding Indian General Assistance Program, HETF suggests that GAP "2" needs to be designed and funded as a an implementation program, going beyond its current mission of capacity building. Also, EPA should fund certification training for Tribal environmental staff.

NYSDEC and NEWMOA (Northeast Association of Waste Management Officials Association) have developed a database under EPA grant for use by states in tracking performance measures in pollution prevention and compliance assistance. The relevant targets identified in Goal 5 re: Compliance and Environmental Stewardship should be aligned to the extent possible with these measures, as this is where at least some data to support progress of this goal is likely to come from.